REMARKS

Claims 1-10 stand rejected under 35 U.S.C. § 102(e) as allegedly anticipated by Mimura. Applicants respectfully submit that, for the reasons given below, the Examiner's rejection of claims 1-10 should be withdrawn.

**Claims 1-7**

The Examiner equates the limitation in claim 1 of "receiving, over time, a plurality of audio-visual/video objects and composition information for the objects" to the disclosure by Mimura of an AV SEPARATOR. Office Action at page 2 (citing Mimura, Fig. 11 and Col. 9 lines 10-29). The Examiner also states that this limitation is disclosed by Mimura, since "Mimura clearly teaches object-based audio-visual/video data." *Id.* (citing Mimura, Fig. 4, items 26 and 27, and Col. 11, lines 40-50). Applicants respectfully disagree.

The function of the AV SEPARATOR disclosed by Mimura is to separate an AV signal "transmitted from a remote site . . . into an audio signal and a video signal." Mimura at Col. 8, lines 46-48. Mimura further teaches the storage in an AV database of "combinations of the video signal characteristics and corresponding audio signal processing parameters." *Id.* at Col. 8, lines 14-15. Mimura thus purportedly uses the AV SEPARATOR to make playback more realistic for multi-point video-conferending applications.

In contrast, the present application, as noted in the abstract, "relates to the representation, transmission, processing and display of [object-based] video and audio-visual information." Application at page 1, lines 2-5. Both as a general matter, and specifically as it used in the present application, in object-based coding, high-level structure of visual content "is described in terms of 'objects' which have immediate visual relevancy, representing familiar physical objects, e.g., a ball. a table, a person, a tune or a spoken phrase", that is "independently encoded using a compression technique that gives best quality for each object." *Id.* at lines 7-15. "The compressed objects are sent to a terminal along with composition information which tells the terminal where to position the objects in a scene." *Id.* at page 1, lines 15-18. The terminal then "decodes the objects and positions them in the scene as specified by the composition information." *Id.* at lines 18-20.

Because Mimura does not disclose or suggest receipt of a plurality of compressed objects and composition information, Mimura's disclosure of an AV SEPARATOR and its use to separate an AV signal into its audio and video component signals does not teach the limitation in claim 1 of "receiving, over time, a plurality of audio-visual/video objects and composition information for the objects."

The Examiner offers Mimura's statement that, "[f]or example, the image memory **30** stores the latest video signal, and the image memory **31** stores the image signal one frame before," Mimura at Col. 13, lines 3-5, as disclosing the limitation in claim 1 of "storing in a cache memory at least one of the objects." Office Action at 2. Applicants respectfully disagree with the Examiner's analysis. Because Mimura does not teach the use of objects, Mimura does not disclose the limitation in claim 1 of "storing in a cache memory at least one of the objects."

The Examiner further notes that the limitation in claim 1 of "composing scenes from said objects including the one of the objects stored in the cache memory" is disclosed by Mimura. Office Action at 2 (citing Mimura at Fig. 11, item 3, and Col. 9, lines 10-29). Applicants respectfully disagree with this analysis. The AUDIO SIGNAL PROCESSOR shown in Fig. 11 and Mimura's description of Fig. 2 relate to the processing of separate audio and visual signals, and not to the act of composing a scene using objects. Thus, Mimura does not teach the limitation in claim 1 of "composing scenes from said objects including the one of the objects stored in the cache memory."

The Examiner notes that the final limitation of independent claim1, "displaying the composed scenes", is also disclosed by Mimura. Office Action at 3 (citing Mimura at Fig. 11, item 5, and Col.4, lines 55-62). Applicant's respectfully disagree. The DISPLAY TERMINAL shown in Fig. 11 does not display images that have been composed from objects, and so do not teach the limitation in claim 1 of "displaying the composed scenes."

For the reasons given above, Applicants respectfully request that the rejection of claim 1 be withdrawn. Furthermore, because Claims 2-7 depend on claim 1, and therefore, incorporate all of its limitations, Applicants respectfully request that the rejections for claims 2-7 also be withdrawn.

**Claims 8, 9 and 10**

The Examiner states that the limitation in claim 8 of "a controller circuit for controlling acquisition over time of a plurality of audio-visual/video objects and composition information for the objects" is dislosed by Mimura at Fig. 17, item 111, Col. 4, lines 4-33, Fig. 4, items 26 and 27, and at Col. 11, lines 40-50. Office Action at 3. Applicant's respectfully disagree. The AV CONTROLLER in Fig. 17 and the processing of the INPUT SIGNAL and REFERENCE SIGNAL in Fig. 4 each relate to the processing of separate audio and video signals using a reference signal and do not teach a control circuit for controlling the acquisition of a plurality of AV objects and composition information. Thus, Mimura does not disclose or suggest the limitation in claim 8 of "a controller circuit for controlling acquisition over time of a plurality of audio-visual/video objects and composition information for the objects."

The Examiner further notes that the limitation " in claim 8 of a cache memory for storing at least one of the objects" is disclosed by Mimura at Col. 13, lines 3-5. Office Action at 3. Applicants respectfully disagree. Because Mimura does not disclose or suggest the use of objects, Mimura does not disclose the limitation in claim 8 of "a cache memory for storing at least one of the objects."

The Examiner argues that the limitation "a composer circuit, coupled to the cache memory, for composing scenes from said video objects including the one of the objects stored in teh cache memory" is disclosed by Mimura at Col. 9, lines 10-29, and Fig. 11, items 3 and 66. Office Action at 3. Applicants respectfully disagree. The AUDIO SIGNAL PROCESSOR and VIDEO SIGNAL ANALYZER shown in Fig. 11 and Mimura's description of Fig. 2 relate to the processing of separate audio and visual signals, and not to the composing of a scene using objects. Thus, Mimura does not disclose or suggest the limitation in claim 8 of "a composer circuit, coupled to the cache memory, for composing scenes from said video objects including the one of the objects stored in teh cache memory."

The final limitation of claim 8, "and a display for the composed scene", according to the Examiner, is disclosed by Mimura at Fig. 11, item 5, and Col. 4, lines 55-62. Office Action at 3. Applicant's respectfully disagree. The DISPLAY TERMINAL shown in Fig. 11 does not display images that have been composed from objects, and so does not disclose or suggest the limitation in claim 8 of "a display for the composed scene."

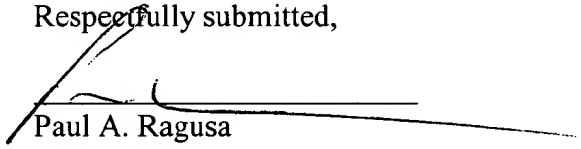
The Examiner rejects claims 9 and 10 "for the same reasons as claim 8." Office Action at page 4. Accordingly, because Applicants submit that the rejection of claim 8 should be withdrawn, at least for the reason that claim 8 involves objects and composition information, the rejection of claims 9 and 10 should also be withdrawn, since these claims also involve objects and composition information. For example, claim 9 contains the limitation "controlling acquisition over time of a plurality of audio-visual/video objects and composition information for the objects" and claim 10 contains the limitation of "a means for controlling acquisition over time of a plurality of audio-visual/video objects and composition information for the objects." As explained in detail above, Mimura does not disclose objects or composition information and so does not anticipate claims 9 and 10.

For the reasons given above, Applicants respectfully request that the rejection of claims 8, 9 and 10 be withdrawn.

## CONCLUSION

Applicants respectfully submit that this application is in condition for allowance, and such disposition is earnestly solicited.

Respectfully submitted,



Paul A. Ragusa
Patent Office Reg. No. 38,587

Attorney for Applicants

BAKER BOTTS L.L.P.
30 Rockefeller Plaza
New York, NY 10112
(212) 408-2588